



THE COMMONWEALTH OF MASSACHUSETTS
OFFICE OF CONSUMER AFFAIRS AND BUSINESS REGULATION

**DEPARTMENT OF
TELECOMMUNICATIONS & ENERGY**

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June 5, 2002

Robert Werlin
Keegan, Werlin and Pabian, LLP
21 Custom House Street
Boston, MA 02110

Re: KeySpan Energy Delivery D.T.E. 02-32

Dear Mr. Werlin:

Enclosed please find the Department of Telecommunications and Energy's Second Set of Information Requests to KeySpan Energy Delivery New England ("the Company") issued in the above-captioned matter. Please submit the Company's responses on or before 5 P.M., Monday, June 10, 2002.

Thank you for your attention in this matter.

Sincerely,

Elizabeth A. Cellucci
Hearing Officer

Enc.

cc: Mary Cottrell, Secretary
Joseph Rogers, Office of the Attorney General

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

SECOND SET OF INFORMATION REQUESTS OF
THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY
TO KEYSpan ENERGY DELIVERY NEW ENGLAND
D.T.E. 02-32

Pursuant to 220 C.M.R. § 1.06 (6)(c), the Department of Telecommunications and Energy ("Department") submits to KeySpan Energy Delivery New England ("KeySpan" or "Company") the following Information Request:

INSTRUCTIONS

The following instructions apply to this set of Information Requests and all subsequent Information Requests issued by the Department to the Company in this proceeding.

1. Each request should be answered in writing on a separate three-hole punched page with a recitation of the request, a reference to the request number, the docket number of the case and the name of the person responsible for the answer.
2. Please do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.
3. These requests shall be deemed continuing so as to require further supplemental responses if the Company or its witness receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
4. The term "provide complete and detailed documentation" means:

Provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn, and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting work-papers.
5. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.

6. If the Company finds that any one of these requests is ambiguous, please notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.
7. Please serve a copy of the responses on Mary Cottrell, Secretary of the Department; also submit one (1) copy of the response to: (1) Elizabeth Cellucci, Hearing Officer; (2) Kevin Brannelly, Rates and Revenues Division; (2) Sean Hanley, Rates and Revenues Division; (3) George Yiankos, Gas Division; (4) Claude Francisco, Rates and Revenues Division; (5), Ken Dell Orto, Gas Division; and (6) Becky Hanson, Legal Division.
8. Responses are due by 5:00 p.m., Monday, June 10, 2002.

DTE 2-1 Using the data in the "Meter Reading Schedule for 2001" (Attachment 6), for both the cycle that contains the greatest and least amount of total billing days for 2001, please provide the base-rate bill impact for each month of the year, comparing the current rates and current method of billing to the proposed rates and proposed method of billing. Please calculate this for the heating (R-3) and non-heating (R-1) residential classes and all the C&I classes for all three companies for a customer that has (a) high consumption, (b) low consumption, and (c) average consumption. Please provide a copy of the response in an electronic-readable medium (Microsoft Excel Windows 2000).